

[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

12 KALMAN ISAACS, Individually and on ) Case No. 3:18-cv-04865-EMC  
13 Behalf of All Others Similarly Situated, )  
14 Plaintiff, ) CLASS ACTION  
15 vs. ) [PROPOSED] ORDER CONSOLIDATING  
16 ELON MUSK, et al., ) RELATED ACTIONS, APPOINTING LEAD  
17 Defendants. ) PLAINTIFF, AND APPROVING  
 ) SELECTION OF COUNSEL  
 )  
 )

Having considered Dany David's Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of Selection of Counsel (the "Motion") and good cause appearing therefor, the Court ORDERS as follows:

1. The Motion is GRANTED;

2. Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, the following Related Actions are consolidated as *In re Tesla Inc. Securities Litigation*, Master File No. 18-cv-04865-EMC:

CASE TITLE	CASE NUMBER	CLASS PERIOD ALLEGED	DATE FILED
<i>Isaac v. Musk, et al.</i>	3:18-cv-04865-EMC	08/07/2018-08/08/2018	08/10/2018
<i>Chamberlain v. Tesla, Inc., et al.</i>	3:18-cv-04876-EMC	08/07/2018-08/10/2018	08/10/2018
<i>Yeager v. Tesla, Inc. et al.</i>	3:18-cv-04912-EMC	08/07/2018-08/09/2018	08/13/2018
<i>Maia v. Tesla, Inc., et al.</i>	3:18-cv-04939-EMC	08/07/2018-08/14/2018	08/14/2018
<i>Dua v. Tesla, Inc. et al.</i>	3:18-cv-04948-EMC	08/07/2018-08/08/2018	08/15/2018
<i>Horwitz v. Tesla, Inc., et al.</i>	3:18-cv-05258-EMC	08/07/2018-08/17/2018	08/28/2018
<i>Left v. Tesla, Inc., et al.</i>	3:18-cv-05463-EMC	08/07/2018-08/17/2018	09/06/2018
<i>Fan v. Tesla, Inc., et al.</i>	3:18-cv-05470-EMC	08/07/2018-08/17/2018	09/06/2018
<i>Sodeifi v. Tesla, Inc., et al.</i>	3:18-cv-05899-EMC	08/07/2018-08/10/2018	08/30/2018 <sup>1</sup>

(a) The file in Case No. 18-cv-04865-EMC shall constitute the master file for every action in the consolidated action. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:" When a pleading applies to some, but not all, of the actions, the document shall list, immediately after the phrase "This Document Relates To:", the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action;

---

<sup>1</sup> The *Sodeifi* Action was initially filed in the United States District Court for the Central District of California, and was subsequently transferred to this District on September 24, 2018.

This Order is entered without prejudice to the rights of any party to apply for severance of  
any claim or action, with good cause shown;

9           3. Pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-  
10 4(a)(3)(B), Dany David is appointed as Lead Plaintiff; and

11       4. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Robbins Geller Rudman & Dowd LLP and  
12 Lieff, Cabraser, Heimann & Bernstein, LLP are approved as Lead Counsel.

13 || IT IS SO ORDERED.

14 || DATED:

**THE HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE**